

UNITED STATES DISTRICT COURT

for the
District of New Jersey

CLERK, U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
RECEIVED

Mr. Albert M. Robinson
Mrs. Anita Bhaggan-Robinson

2013 JUN 28 AM 8 17

Plaintiffs,

v.

Civil Action No. 3;11-cv-06139 AET-LHG

State of New Jersey, Mercer County
Vicinage-Family Division et al

Defendants.

Plaintiff's Response to the Judge's Order (Doc 93)

I, Plaintiff Mr. Albert M. Robinson, am in possession of your Order (Doc 93) wishing to clarify your previous Order (Doc 84) which directed the Clerk of Court to NOT accept ANY of my filings. Your Order was specific and crystal clear and left no room for misunderstanding, question or compromise in its denial of my Right to file any documents in this case at bar or any of the other cases associated with it. It was quite clear that the doors of the Court were now CLOSED. Your Order needed no explication as to its intended intentions.

In your Order (Doc 93) you state that;

"The COURT wishes to clarify at this time that the April 23 Order does not preclude Plaintiff from filing opposition or reply papers in accordance with the Federal Rules of Civil Procedure."

This new Order is still a restriction to my Constitutional Right of FREE access to the Judicial System. I am barred from filing ANY motion including but not limited to a Motion to Strike the forged and conflicting affidavits of the Defendants and their witnesses and the forged FRO Complaint and pre trial interview. Even Mr. Dred Scott was allowed access to file his motions in the Court and to participate in the volley of Motions and Responses.

Just to recap the cause of Order Document 84. Because the Defendants admitted to filing the false information about the FRO into the state protected computer system and then complained to the Court that they needed more time in which to contact Ms. Howard and The honorable Judge Andrew J. Smithson, the Court ordered the clerk NOT to accept any of my filings. The NJAG which has over 9000 employees cannot respond and keep abreast of a simple fraud case against what would appear to be a 1L on his best day.

"In addition to providing statewide law enforcement and emergency response services, this Department and its approximately 9,000 employees are responsible for protecting citizens' civil and consumer rights, promoting highway traffic safety, maintaining public confidence in the alcoholic beverage, gaming and racing industries and providing legal services and counsel to other state agencies." (Emphasis added)

That was taken from the website of the NJAG's office the About Us page. The NJAG is telling the Court that it cannot keep up with the filings of a non-attorney when they have over 9000 employees and probably three to four employees working on this case. It is hard for a reasonable person to believe that Ms. Long and her paralegals are having trouble responding to my pleadings unless they are having trouble creating the documents that are necessary to cover up the requests that I have made and getting the correct people to agree to helping cover up the fraud. For the record the Court will Grant the Defendants' Motions prior to me even receiving a copy of the Motion and freely grant the Defendants more time to answer yet the Court has given me less than ten days to respond to the two inch thick Cross Motion for Summary Judgment complete with fake affidavits. Couple this with the NJAG's letter threatening me to not contact any of the affiants to question them of their affidavits, it is a clear violation of 18 U.S.C. § 1512(a)(2)(A) and (B) under color of law and condoned by the Court.

It is clear that the Defendants caused their own conundrum by violating more statutes in their never ending attempt to cover up what is now a crime by the state instead of just a simple bribe between two or more people. It is clear that the Court is appearing biased in favor of the

Defendants.

For the record the Defendants have based their defense on copies of the alleged original documents and the edited affidavits of witnesses who claim that the copies look to be the form which would have been used in 1990. The affiants aver that the documents look to be authentic even though each and every one of the affiants state that they do not remember the case or the FRO. The witnesses all state that this is what the documents would have looked like and not that they have personal knowledge of the case, and without personal knowledge of the situation their affidavits are moot. Also it is highly unlikely that Judge Smithson did not know or know of my Father Mr. Albert M. "Bo" Robinson and would remember if I was in his court. Trenton is such a small town that even the judge of this case at bar personally knows my whole family. Because Trenton is such a small town people know everyone else's business and the NJAG is having trouble trying to convince these people to admit to something that never took place, that being the issuance of the FRO in 1990 or at anytime. That is why the NJAG induced the Court to deny me access to the Federal Judicial system.

The unambiguous order from the Court directing the Clerk of Court not to accept any documents of litigation submitted to me in relationship to this case at bar unequivocally denies me from filing a Motion for Summary Judgment based upon the FACT that the FRO Complaint, and pre trial interview, the envelope (Defendant's evidence D045) and the affidavits of Ms. Annette Howard are created from a PDF editing software. I have attached as Exhibit "A" an expanded printing of each layer used to compose the various documents submitted by the Defendants to authenticate the original FRO which turns out to have been created using a PDF editing software, and incorporate it by reference.

Today Technology has made what was once the job of a professional forger mere child's play with a computer and an Adobe XI or similar editing software. I have attached as Exhibit "B" copy of an example of a PDF edited on a downloadable software called PDFescape which is available to the general public, FOR FREE, and incorporate it by reference. Anyone with the skill to turn on a computer and upload the PDF file to PDFescape can edit the original PDF to say whatever they want it to say.

Opposing counsel, Ms. Janine L. Long even stated to the NJ Superior Court Burlington Div, that she scanned the affidavit and other documents to PDF on June 7th, 2013 to present it to the Honorable Judge Marc Baldwin under a court order to surrender the FV-459-91E file. She stated that she scanned the documents to PDF and I deconstructed them using Debenu.com's PDF tools. See Exhibit "A".

Because I uncovered these acts of criminal forgery among other things the Defendants, and / or their attorney of record, has induced this Honorable Court to remove my Constitutionally guaranteed rights to be heard in a Court of Law. I wish to add a reprint from an article that I read on the American Civil Liberties website.

Victims Of Human Rights Violations Denied Access To Justice In U.S., Says New ACLU Report

December 10, 2010

On International Human Rights Day, Report Calls For Reform

FOR IMMEDIATE RELEASE

CONTACT: (212) 549-2666; media@aclu.org

"NEW YORK – Access to justice for victims of civil and human rights violations has been severely curbed over the last decade, according to a report released today by the American Civil Liberties Union. The report shows how indigent defendants on death row, prisoners suffering abuses in prison, immigrants in unfair removal proceedings, torture victims, domestic violence survivors and victims of racial discrimination, among others, are consistently denied access to the courts and effective remedies as a result of recent laws and court decisions.

"Unfortunately, because of recent laws and court decisions, victims of human rights violations here in the U.S. are continually denied their day in court while those responsible for the abuses are protected," said Jennifer Turner, Human Rights Researcher with the ACLU and author of the report. "Equal justice for all is a core American value and everyone deserves access to the courts to right wrongs done against them. The U.S. should amend restrictive laws and swiftly enact policies to restore access to justice for the most vulnerable among us."

According to the report, "Slamming the Courthouse Doors," the "[a]ctions of the executive, federal legislative, and judicial branches of the United States have seriously restricted access to justice for victims of civil liberties and human rights violations, and have limited the availability of effective (or, in some cases, any) remedies for these violations. Weakened judicial oversight and recent attempts to limit access to justice...are denying victims of human rights violations their day in court and protecting responsible officials and corporations from litigation."" (Emphasis added)

This small article hits the nail foursquare on the head. Because I caught the State of New Jersey forging documents to cover up a bribery case in which a Mercer County employee took a bribe to create an FRO, and then violate the CFAA by submitting this fake FRO information into a national protected computer system, the Court has Slammed shut the Courthouse doors by barring the clerk from accepting any of my filings. It is paradoxical that someone who was neck deep in the fight for Civil Rights in the 60's has now, what seems to be, condoned the actions of the state to cover up a corruption situation by denying my access to litigate this quite simple case. It is not hard to spot an edited PDF, it is not hard to defeat Defendant Meckel's affidavits.

For example Defendant Meckel has submitted two different affidavits. In the first affidavit and the Defendants' Response to Plaintiff's Statement of Uncontroverted Facts Defendant Meckel swore to the Court that he spoke to me on August 8th, 2009 which is the Saturday prior to me even finding out about the FRO. I attach a copy of Defendant Meckel's affidavit and a copy of the page in which Defendants claim that I telephoned Defendant Meckel, as Exhibit "E" and incorporate them by reference. In his second affidavit Defendant Meckel

claims that he spoke to me on September 8th, 2009 which contradicts his previous sworn testimony that he spoke to me on August 8th, 2009 and his documentary evidence that he spoke to me on or about August 21, 2009 (see Document 91-14, Pg 11 of 31, Page ID 1641 or Exhibit F). I attach a copy of Defendant Meckel's affidavit as Exhibit "F" and incorporate it by reference. Defendant Meckel's affidavits, not surprisingly, contradicts the affidavit and tape recorded statements of Ms. Eleanor G. D who in a telephone conversation with me stated that Defendant Meckel was on vacation until September 1st, 2009 and her affidavit and FACTS entry submitted in the Defendants' Cross Motion for Summary Judgment contradicts the Family Automated Case Tracking System (FACTS) records that Defendant Meckel has submitted in the Defendants' Cross Motion for Judgment. I attach a copy of Eleanor Ball's affidavit and FACTS records as Exhibit "G" and incorporate them by reference. For the record Ms. Ball also swore under penalty of perjury that on August 24, 1990, which is approximately 61 days prior to October 24, 1990 the date that the FRO was allegedly issued on, she sent me a copy of the TRO and FRO. (See Document 91-5, Pg 5 of 23 Page ID 1510). She swore that she mailed them to me Certified Mail which is the alleged envelope in Document 91-5, Pg 18 of 23, Page ID 1523 or D045 in Exhibit B the unedited version. The year is skillfully omitted from the postmarked date to give the illusion that I was really informed of the TRO and FRO in 1990 of that it really existed in 1990.

In addition Defendant Meckel swore under penalty of Perjury that the "91" in the File No. FV-11-459-91E stands for the Court calendar year beginning in July of 1990 (See Document 91-14, Pg 4 of 31, Page ID 1634, also Exhibit F). This is in direct contrast to the affidavit of Mr. James C. McGarigle in which he swore under penalty of perjury that the "91" in File No FV-11-459-91E stands for the calendar year of July of 1991. He states that the "91" means the Court

calendar year, which began in July of 1991, and not the calendar year of 1990, when the Complaint was docketed. Given that Mr. McGarigle was employed in the Mercer County Family Court in 1990 and Defendant Meckel WAS NOT, a reasonable person would have to concede that Mr. McGarigle would have first hand knowledge on the Court Calendar Years of 1990 and 1991. I attached a copy of the pertinent part of Mr. McGarigle's affidavit as Exhibit "H" and incorporate it by reference.

That and many more mistakes is why the Defendants induced the Judge of this Honorable Court to bar me from filing an opposition or worse, subpoenaing the affiants to testify as to the authenticity of their affidavits in order to strike the Affidavits of the Defendants and the affiants. When I subpoenaed the witnesses in state court Defendant Meckel cried foul and Motioned to Quash the subpoenas.

The Defendants have created a cacophony of PDF created affidavits and documentary evidence that contradicts itself at each and every new juncture. That is why my pleadings had to constantly change to include each and every new violation that the Defendants committed such as the CFAA violations that are the outcome from the Defendants entering the forged information into the FACTS records. Now with these new sham affidavits and fake documents the Defendants have set up themselves and the State of NJ for the inevitable R.I.C.O. suit pursuant to the Pinkerton Doctrine.

Subsequently the Court has barred me from filing a Motion for Sanctions against the Honorable Jeffrey S. Chiesa who, in direct violation of Rule 26(a)(3)(A)(i), wrote a letter by way of his Deputy Attorney General Ms. Janine L. Long, threatening me to back off trying to contact Ms. Howard and the rest of the affiants so that I could question them on their sworn testimony. I

have attached as Exhibit "C" a copy of the letter that was sent to me when I tried to contact Ms. Jessie Robinson from the Womenspace and incorporate it by reference.

RULE 26. DUTY TO DISCLOSE; GENERAL PROVISIONS GOVERNING DISCOVERY

(a) Required Disclosures.

(1) *Initial Disclosure.*

(A) *In General.* Except as exempted by Rule 26(a)(1)(B) or as otherwise stipulated or ordered by the court, a party must, without awaiting a discovery request, provide to the other parties:

(i) the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

The Attorney General's actions are in direct and defiant violation of Rule 26. Aside from not wanting to give me the information required in Rule 26 I was specifically told NOT to contact her or any of the other witnesses. At the very same time to prevent the truth from being told about the fake affidavits Defendant Meckel filed an emergent Motion to Quash the subpoenas of Ms. Howard and Ms. Robinson so that they could not testify in the case of Robinson v. Meckel, Superior Court of NJ, Case No. Burl-L-2133-12.

I took Ms. Long's letter as an unmistakable threat of violence under color of law. I can say this because I, as a minority, am very aware and very much afraid of corrupt police, seeing that I was held in front of Home Depot naked from the waist down while a Houston police officer searched my vehicle screaming about how dirty I was. In a clear case of Whitecapping, Home Depot called Officer Jeffrey Sean Hasley because Home Depot was out of generators and I was selling generators across the street from them. It was two days after Hurricane Ike went thought the city. I was not searched on my person, he just walked up to me after I was

handcuffed and unloosened my belt and pulled my pants and underwear down in front of a very large crowd and made me stand there while he tried to get me angry enough to justifiably shoot me. I was not arrested and the final outcome of the USDC in Houston was that no crime had been committed and the officer was justified in exposing me to the many women and little children there taking pictures.

I have a deep rooted fear of corrupt Trenton law enforcement because when I was 14 I was arrested two days before an NAACP election in which my Father was running for the presidential seat. I was arrested on the Friday before the Sunday election. My Father won but at the time I did not know why this was so important, now I understand and continue his fight. I have an acute fear of Mercer County Family Court because when my sister ran for mayor of Trenton in 1998 I was again arrested falsely for child support arrears. This made the front page of the Trentonian as usual and when I went to city hall to tell them that I was not running for my Father's old seat it made the front page again. There was never any hearing for my arrest and the outcome of the arrears charges were that I was over paid the exact same amount that I had paid the court for the arrears. Someone just wanted to discredit my family by using me and back then the Mercer County Family Court was an easy way to assassinate ones character and so it seems today as well.

"Once a government is committed to the principle of silencing the voice of opposition, it has only one way to go, and that is down the path of increasingly repressive measures, until it becomes a source of terror to all its citizens and creates a country where everyone lives in fear." Harry S. Truman

During all of this involvement with the Mercer County Family Court from 1991 to 2001 there was NEVER any mention of the FRO in the FD file or modification hearings. Which if the FRO was authentic as the Defendants claim, and issued by Judge Smithson, any and ALL hearings would have had to have been conducted in front of Judge Smithson. In addition there

was never any mention of these incidents in the contrived FACTS records for the FRO submitted by the Defendants. By NJ law these two files were to have been combined under FV-11-459-91E and required to reflect one another. Also the many hearings on record contradict the claims of the Defendants in which they claim not to have been able to find me to serve me with the fake FRO.

So taking this all into consideration and factoring in the Eggshell skull Rule I was justified in my perceived assumptions that Ms. Long was threatening me to stay away from talking to any of the affiants and witnesses, or else I would suffer being arrested and possibly shoot for the catch-all claim against minorities, “resisting arrest”. We are talking about the top law enforcement agency in the State of New Jersey which is, in all respects, a state known for police brutality and corruption of public officials. I have no doubt that if I was in New Jersey during this instantaneous case I would have already been arrested on some false charge so that I would drop this case. Given these facts, the amount of damages involved, the ramifications the verdict in my favor would have on the credibility of the NJ Judiciary, and my perception that I was being threatened with the statistically proven high probability of violence under color of law, it would quite convincingly appear that the Attorney General is in violation of ;

18 U.S.C. § 1512(a)(2)(A) and (B) which states that;

“Whoever uses physical force or the threat of physical force against any person, or attempts to do so, with intent to--

(A) influence, delay, or prevent the testimony of any person in an official Proceeding;”

(The Attorney General prevented the testimony of Ms. Howard and Ms. Robinson and petitioned the Burlington court in NJ to bar me from subpoenaing the rest of the affiants.)

“(B) cause or induce any person to--

(i) withhold testimony, or withhold a record, document, or other object, from an official proceeding;

(The attorney general induced Ms. Howard to disregard the subpoena and not appear as directed.)

*“(ii) alter, destroy, mutilate, or conceal an object with intent to impair the integrity or availability of the object for use in an official proceeding;”
commits a crime.”*

Ms. Long admitted to the Burlington Court that she created a set of PDF's on June 7th, 2013 these are the same PDF's that I have deconstructed and supplied to this Court as Exhibit “A”. Ms. Long and the Defendants have been withholding these PDF created documents from the date that I first filed suit. Defendant Meckel showed me the copy of the FRO and TRO but not the pretrial interview when I travelled to NJ to view the file. There was no school letter or Dr.'s report or any Notice of hearing in the file when I viewed it in 2010.

It is clear that the NJ Attorney General, and Ms. Long have threatened me to stop trying to contact Ms. Howard and the rest of the affiants even though they are not being represented by the NJAG's office and will most assuredly be called to testify in this case at bar. It is court record that Ms. Long, with the help of the NJ Judiciary, induced the witnesses to be absent from the hearing on June 7th, 2013² in NJ Superior Court case No. Burl-L-2133-12 in which their testimony was crucial in the authentication of their affidavits and the FV file. I have attached a copy of the Proof of Service as Exhibit “D” and incorporate it by reference.

Conclusion


With all due respect I feel that the Court has already made its decision as the case has already been thrown out prior to this. I feel that the Court is going to Grant the Defendants' Cross Motion for Summary Judgment based on the profuse amount of affidavits signed stamped and sealed. Your Honor, you know me, my Father & Mother, you even knew my Grandparents

Theodore and Annabelle Carter and my Father's adopted Mother Ms. Bessie Nelms Hill. My Father and Grandfather always told me that all a man has is his reputation. We come into the world with nothing and we leave with nothing and alls we have to leave behind are our works and our reputation. I refuse to leave my daughters the reputation that their Father was involved in a Domestic Violence crime. I will continue this case long after it has been dismissed and write about it in books and magazines. I am also teaching my middle daughter who is on the A Honor roll and received an award from the President about this case and how to continue it and what papers to file.

This case goes way beyond just me and my part of it. This case points to the total breakdown of the Judicial System in which the Attorney General can create documents to authenticate a document that was created because a bribe was given to a County employee who thought he would not get caught. The Defendants have created so many documents that they have lost track of them and the old documents are coming back to contradict the newly created documents.

As this case closes, again, I will appeal it, again. As the Defendants violate new statutes I will file, again. I owe it to the family that came before me and the family that will come after me, and in a funny way, I owe it to all of the people that my Father loved and fought for in the city of Trenton.

Date: Monday, June 24, 2013



Mr. Albert M. Robinson
P.O. Box 495-672
Port Charlotte, Florida 33949
USPoliceSupply@aol.com
(941) 249-1963